

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**Civil Action
No: 21-cv-12081-NMG**

**In re: COMPLAINT OF VIKING POWER,
LLC FOR EXONERATION FROM OR
LIMITATION OF LIABILITY,
CIVIL AND MARITIME**

ANSWER OF THE TOWN OF FAIRHAVEN

The Town of Fairhaven's costs arising from the fire loss to the vessel Miss Dunia and the Town's fire and environmental hazard response to that fire have been paid in full to the Town by Frank Corp. The Town of Fairhaven has no claim against Viking Power, LLC related to those costs. The Town of Fairhaven is not a party claimant in this action, for any purpose, including, but not limited to, any determination of the Court pursuant to 46 U.S.C. §30507. In response to each of the averments of the complaint the Town of Fairhaven states:

1. Admitted.
2. Admitted.
3. The Town of Fairhaven is without information or knowledge sufficient to form a belief as to the truth of this averment.
4. The Town of Fairhaven is without information or knowledge sufficient to form a belief as to the truth of this averment.
5. Admitted that the vessel was secured as described, and otherwise the Town of Fairhaven is without information or knowledge sufficient to form a belief as to the truth of this averment.

6. Admitted.
7. The Town of Fairhaven is without information or knowledge sufficient to form a belief as to the truth of this averment.
8. The Town of Fairhaven is without information or knowledge sufficient to form a belief as to the truth of this averment.
9. The Town of Fairhaven is without information or knowledge sufficient to form a belief as to the truth of this averment.
10. The Town of Fairhaven is without information or knowledge sufficient to form a belief as to the existence of other civil action.
11. The Town of Fairhaven is without information or knowledge sufficient to form a belief as to the truth of this averment.
12. This is not an averment of fact to which the Town of Fairhaven can answer.
13. This is not an averment of fact to which the Town of Fairhaven can answer.
14. This is not an averment of fact to which the Town of Fairhaven can answer.

WHEREFORE, The Town of Fairhaven prays that the Court dismiss the complaint, as it relates to the Town of Fairhaven.

Date: July 25, 2022

Town of Fairhaven,
By its Attorney
/s/ Thomas P. Crotty
Thomas P. Crotty & Associates, PLLC
7 Fort Street
Fairhaven, MA 02719
508.996-8291
tomcrotty@tcrottylaw.com
BBO # 106800

Certificate of Service

Service of the Answer of the Town of Fairhaven has been made this day by electronic mailing to John J. Bromley, Esq. at tojbromley@clinmuzyka.com, Board of Trade Building, One India Street, Suite 200, Boston, MA 02109.

Date: July 25, 2022

/s/ Thomas P. Crotty
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